

CIVIL ACTION NO.: 1:17-CV-00854-TDS-LPA

Defendants.

**DEFENDANTS' MOTION TO SEAL**  
**DOCUMENTS**

**1. Personnel Information:** The following documents and exhibits contain personnel information about employees and/or former employees of PPM who are *not parties* to this action:

**a. Nagelski Deposition Excerpts and Exhibits**

- i. Deposition Excerpts: pp. 29-32, 144, 150, 181, 187-91, 199, 242
- ii. Exhibits 6, 8-9, and 11-15

**b. Rebecca Kovalich Deposition**

- i. Deposition Excerpts: pp. 96, 99-100, 102-6, 214-17, 232
- ii. Deposition Exhibits: 12 and 13

**c. Dr. David Spivey Deposition**

- i. Deposition Excerpts: pp. 70, 90, 124, 173, 181-82; and 245
- ii. Exhibits 27 and 90

**d. Sherry Spivey Deposition**

- i. Exhibit 63 and 67

**e. Mary Benton Deposition**

- i. Deposition Excerpts: 97-98 and 107

**f. Wendy Yontz Deposition**

- i. Deposition Excerpts: 50 and 71

**g. 30(b)(6) Deposition (Volume I and II)**

- i. Deposition Excerpts: 16-18
- ii. Exhibit 102

**h. Sherry Spivey Declaration**

- i. Exhibits 1 and 2

- i. **Wendy Yontz Declaration**
    - i. Wendy Yontz Declaration
    - ii. Exhibits 2-4, 8, 12-13, 16, 18-19
  - j. **Brandi Frey Declaration**
    - i. Brandi Frey Declaration
2. **Confidential, Proprietary Business and Financial Information:** The following documents and exhibits contain confidential, proprietary business and financial information:
- a. **Rebecca Kovalich Deposition**
    - i. Deposition Excerpts: pp. 121-127, 161-62, 169-173, 188, 195, 196, 206, 224, 228, 229
    - ii. Exhibit 17
  - b. **Dr. Davd Spivey Deposition**
    - i. Deposition Excerpts: pp. 51 and 132
  - c. **Mary Benton Declaration**
    - i. Exhibits 1 and 2

In support of their Motion, Defendants submit *Defendant's Memorandum of Law in Support of Motion to Seal Documents*, filed contemporaneously herewith.

WHEREFORE, Defendants respectfully request that the Court grant their Motion and order that that the aforementioned documents be filed under seal.

Respectfully submitted this the 1<sup>st</sup> day of October, 2018.

JACKSON LEWIS P.C.

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IN THE UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF NORTH CAROLINA  
CIVIL ACTION NO.: 1:17-CV-00854-TDS-LPA

REBECCA KOVALICH and  
SUZANNE NAGELSKI,

Plaintiffs,

vs.

PREFERRED PAIN MANAGEMENT  
& SPINE CARE, P.A., *et al.*,

Defendants.

**CERTIFICATE OF SERVICE**

The undersigned certifies that on October 1, 2018, the foregoing *Defendants'* *Motion to Seal Documents* was filed with the Clerk of the Court, using the Court's CM/ECF system, which will send notification of such filing as follows:

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